



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

200 PORTLAND STREET
BOSTON, MASSACHUSETTS 02114

TOM REILLY
ATTORNEY GENERAL

(617) 727-2200
<http://www.ago.state.ma.us>

October 2, 2003

Sent via e-mail, hand-delivery, and/or U.S. Mail

Mary L. Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

Re: UNE Triennial Review Regarding Switching for Mass Market Customers,
D.T.E. 03-60

Dear Secretary Cottrell:

Enclosed for filing please find the Attorney General's proposed First Set of Document and Information Requests to the CLECs, AG-CLEC-1-1 to 1-3, together with a Certificate of Service. These questions are supplemental to those suggested by Verizon and Conversent. We request that responses to the Verizon and Conversent questions be provided in an electronic Excel spreadsheet file format as well as in paper format where data tables are requested.

Sincerely,

Karlen J. Reed
Assistant Attorney General
Utilities Division
200 Portland Street, 4th Floor
Boston, MA 02114
(617) 727-2200 ext. 3436

KJR/kr
Enc.

cc: Paula Foley, Hearing Officer/AGC (w/ enc.)
D.T.E. 03-60 Service List (w/enc.)

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Proceeding by the Department of Telecommunications and Energy on its)	
own Motion to Implement the Requirements of the Federal)	
Communications Commission's Triennial Review Order Regarding)	D.T.E. 03-60
Switching for Mass Market Customers.)	
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**ATTORNEY GENERAL'S
FIRST SET OF DOCUMENT AND INFORMATION REQUESTS
TO ALL CLECs DOING BUSINESS IN MASSACHUSETTS**

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to each CLEC doing business in Massachusetts or to any individual or entity sponsoring testimony or retained by any CLEC to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a

document is self-identifying, it need not be separately identified.

7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If a CLEC cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the CLEC cannot answer the Request in full, and state what information or knowledge is in the CLEC's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.
13. If you refuse to respond to any Document and Information Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide two copies of each response to the Attorney General.

16. Unless the Request specifically provides otherwise, the term "CLEC" refers to all competitive local exchange carriers doing business in Massachusetts and includes all of their witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.
18. Please provide all responses to requests by October 23, 2003, as per the Hearing Officer's ruling and Memorandum of September 25 and 26, 2003.

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**ATTORNEY GENERAL'S
FIRST SET OF DOCUMENT AND INFORMATION REQUESTS
TO ALL CLECs DOING BUSINESS IN MASSACHUSETTS**

AG-CLEC-1-1

- a) Please provide a list of all the wire centers in Massachusetts in which you serve customers.
- b) For each wire center listed in a), please indicate (Yes or No) whether Collocation (either federally-tariffed or state-tariffed) is used by your company.
- c) If the answer to b) is yes, please supply the collocation provider name and type of collocation.
- d) For each wire center listed in a), please provide the location and owner of the switch(s) that you use to provide your customers with dial tone if other than Verizon.
- e) For each wire center listed in a), please provide the date that the arrangement was placed in service.

AG-CLEC-1-2 Please provide a list of all the telephone companies that you supply any network connections or portions of connections to (including collocation). Please supply the data in an Excel spreadsheet file as well as a paper version.

AG-CLEC-1-3 Please list specifically all barriers to entry that you face in offering telephone service in Massachusetts for each of the markets that you serve.

Proceeding by the Department of Telecommunications and Energy on its
own Motion to Implement the Requirements of the Federal
Communications Commission's Triennial Review Order Regarding
Switching for Mass Market Customers.

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